# ELLIOTT & ELLIOTT, P.A.

# ATTORNEYS AT LAW

1508 LADY STREET

COLUMBIA, SOUTH CAROLINA 29201 selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

January 13, 2015

### **VIA E-FILING**

Ms. Jocelyn D. Boyd Chief Clerk of the Commission SC Public Service Commission P. O. Drawer 11649 Columbia, SC 29211

RE:

Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas

Company

Docket No. 2015-2-E

Dear Ms. Boyd:

Enclosed please find for filing the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk

**Enclosures** 

cc:

Jeffrey M. Nelson, Esquire (w/encl.)

Andrew M. Bateman, Esquire (w/encl.)

K. Chad Burgess, Esquire (w/encl.)

Kevin Hall, Esquire (w/encl.)

#### BEFORE

#### THE PUBLIC SERVICE COMMISSION OF

#### SOUTH CAROLINA

#### **DOCKET NO. 2015-2-E**

IN RE:	)	
Annual Review of Base Rates for Fuel Costs	)	
For South Carolina Electric & Gas Company	)	PETITION TO INTERVENE

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

- 1. That S.C. Code Ann. §58-27-865 establishes a procedure for annual fuel hearings to allow the Commission and all interested parties to review the fuel purchasing practices and policies of South Carolina Electric & Gas Company (SCE&G), and for the Commission to determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable.
- That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.
- 3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.

- That SCEUC and its members have a direct and material interest in the issues to 4. be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.
- That given the state of the record at this stage of the proceedings, SCEUC lacks 5. sufficient information to fully develop and state its position in this proceeding at this time.
- That granting SCEUC's request to be made a party of record in this proceeding is 6. in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
  - That Petitioner is represented by counsel in this proceeding as follows: 7.

Scott Elliott, Esquire Elliott & Elliott, P.A. 1508 Lady Street

Columbia, South Carolina 29201

Telephone: 803-771-0555

Fax: 803-771-8010

selliott@elliottlaw.us

WHEREFORE, Petitioner prays for the following relief:

- That this Petition to Intervene be accepted and that Petitioner be made a party of a. record;
- That Petitioner be allowed to participate fully in this proceeding and take such b. positions as it deems advisable; and

c. For such other and further relief as is just and proper.

Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street

Columbia, SC 29201 (803) 771-0555

Attorney for the South Carolina Energy Users Committee

January 13, 2015

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Annual Review of Base Rates for Fuel Costs for South

Carolina Electric & Gas Company

DOCKET NO.: 2015-2-E

PARTIES SERVED: Jeffrey M. Nelson, Esquire

Andrew M. Bateman, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900

Columbia, SC 29201

K. Chad Burgess, Associate General Counsel South Carolina Electric & Gas Company/SCANA

Corporation MC C222

220 Operation Way Cayce, SC 29033-3701

Kevin Hall, Esquire

Womble, Carlyle, Sandridge & Rice, LLP

1727 Hampton Street

Columbia, South Carolina 29201

PLEADING: Petition to Intervene

January 13, 2015

Linda B. Kitchens, Legal Assistant